



Law Offices Of

## IANNUZZI AND IANNUZZI

Nicholas P. Iannuzzi (1930-1972)  
John Nicholas Iannuzzi, J.D.

Honorable Sterling Johnson, Jr.  
United States District Court  
Eastern District of New York  
225 Cadman Plaza East  
Brooklyn, New York 11277

### VIA ELECTRONIC FILING

Re: **United States v. Daly**  
**Docket No.: 10 CR 192 (SJ)**

Honorable Sir:

Our office represents Taslim Daly, who is scheduled for sentencing in connection with a violation of Probation before Your Honor on Thursday, February 9, 2012 at 9:30 a.m. The sentencing was originally scheduled on the Court's calendar for January 18, 2012 but was adjourned because both parties and the probation officer were unavailable.

Our office has contacted Robert Polemeni, the AUSA assigned to this matter, on at least two (2) separate occasions to request the Government's pre-sentencing report so that the Defendant may submit a response thereto. To date, the Government has failed to provide any documents or pre-sentencing report whatsoever.

In light of the foregoing, please consider this letter an Application to adjourn the Defendant's sentencing. As we have been unable to reach the Government to discuss the instant application, we cannot indicate whether it consents and can only propose three alternative adjourn dates on which Defendant is available to appear. Those dates are as follows: February 28, 2012 at 9:30 a.m.; March 2, 2012 at 9:30 a.m.; and March 13, 2012 at 9:30 a.m.

Defendant also hereby respectfully requests that the Court direct the Government to provide Defense Counsel with any documents and reports it intends to present to the Court in connection with the Defendant's sentencing at least one (1) week prior to the scheduled sentencing date.

If there is any further information required concerning the above said, please have someone on Your Honor's staff contact us and we shall be pleased to provide the same.

Respectfully,

IANNUZZI and IANNUZZI

  
By: Matthew P. Raso, Esq.

City of New York  
February 7, 2012

C: AUSA Robert Polemeni

74 Trinity Place - City of New York 10006 - (212) BA7-9595  
Long Island 775 Park Avenue - Huntington 11743 - (631) 385-8182  
Connecticut 266 Post Road East - Westport - H.D. Murphy  
Los Angeles 1377 West Olympic Boulevard - D.A. Elden  
Washington, D.C. - 1615 L Street, N.W. - D.E. Santerelli  
San Francisco 345 Franklin Street - Hugh Anthony Levine  
Ramat Via XX Settembre, 118 - Av. Mauro Fierro  
Montreal 1592 Ave. des Pins W. - Claude Girouard  
Nassau, Bahamas - Trinity Place - Kord Smith M.P.  
E-mail - LawOffice@Iannuzzi.net  
Faxville (212) BA7-2099